

HISCOCK & BARCLAY<sup>LLP</sup>

Joseph A. Murphy  
Associate

December 1, 2014

**Via Electronic Filing**

Hon. John G. Koeltl  
Attn: Mr. Don Fletcher, Clerk  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: United States v. Narco Freedom Inc. (14 Civ. 8593)

Dear Judge Koeltl:

We represent Defendant, Narco Freedom, Inc., in this matter.

We write to clarify the naming references to the exhibits that Narco Freedom has previously submitted and to submit additional exhibits that we intend to rely on at the hearing scheduled for December 2, 2014.

The documents that we previously submitted are:

- “Defendant’s Ex. A”: Parole Orders from New York State Department of Corrections and Community Services that were identified at the hearing in this matter on October 29, 2014.
- “Defendant’s Ex. B”: ECF Document Number 33-1, Exhibit A to the Declaration of Gerald Bethea.
- “Defendant’s Ex. C”: ECF Document Number 33-2, Exhibit B to the Declaration of Gerald Bethea
- “Defendant’s Ex. D”: ECF Document Number 33-3, Exhibit C to the Declaration of Gerald Bethea
- “Defendant’s Ex. E”: ECF Document Number 33-4, Exhibit D to the Expert Report of Gerald Bethea

80 State Street – Albany, New York 12207 hblaw.com  
jmurphy@hblaw.com Direct: 518.429.4248 Fax: 518.533.2943

- “Defendant’s Ex. F”: ECF Document Number 34-1, Exhibit A to the Expert Report of Edward Nunes, M.D.
- “Defendant’s Ex. G”: ECF Document Number 34-2, Exhibit B to the Expert Report of Edward Nunes, M.D.
- “Defendant’s Ex. H”: ECF Document Number 35-1, Exhibit A to the Expert Report of Janet Lerner, PhD.
- “Defendant’s Ex. I”: ECF Document Number 35-2, Exhibit B to the Expert Report of Janet Lerner, PhD.
- “Defendant’s Ex. J”: ECF Document Number 35-3, Exhibit C (Part 1 of 2) to the Expert Report of Janet Lerner, PhD. There was a technical defect with the e-filed version of this document. We are therefore re-submitting it as Defendants’ Exhibit P.
- “Defendant’s Ex. K”: ECF Document Number 35-4, Exhibit C (Part 2 of 2) to the Expert Report of Janet Lerner, PhD. There was a technical defect with the e-filed version of this document. We are therefore re-submitting it as Defendants’ Exhibit Q.
- “Defendant’s Ex. L”: ECF Document Number 35-5, Exhibit D to the Expert Report of Janet Lerner, PhD.

Additional documents that we intend to rely on at the hearing are:

- “Defendant’s Ex. M”: Article, Motivational Incentives Research in the National Drug Abuse treatment Clinical Trials Network. This document was disclosed in Defendant’s Ex. G, ECF Document Number 34-2, Exhibit B to the Expert Report of Edward Nunes, M.D.
- “Defendant’s Ex. N”: Article, Treatment Structure and Program Services in the Drug Abuse Treatment Outcome Study. This document was disclosed in Defendant’s Ex. G, ECF Document Number 34-2, Exhibit B to the Expert Report of Edward Nunes, M.D.
- “Defendant’s Ex. O”: Article, Voucher-based reinforcement of cocaine abstinence in treatment-resistant methadone patients. This document was disclosed in Defendant’s Ex. G, ECF Document Number 34-2, Exhibit B to the Expert Report of Edward Nunes, M.D.
- “Defendant’s Ex. P”: Article (Part 1 of 2), Substance Abuse Treatment: What Works for Homeless People? Nat. Health Care for the Homeless Council (June 2002).
- “Defendant’s Ex. Q”: Article (Part 2 of 2), Substance Abuse Treatment: What Works for Homeless People? Nat. Health Care for the Homeless Council (June 2002).

- “Defendant’s Ex. R”: NCH Fact Sheet #6, Addiction Disorders and Homelessness, Nat. Coalition for the Homeless (Aug. 2007). This document was disclosed in ECF No. 35, the Expert Report of Janet Lerner, PhD.
- “Defendant’s Ex. S”: DOCCS Final Audit Report for Community Based Residential Program (July 3, 2014)
- “Defendant’s Ex. T”: DOCCS Community Based Residential Programs RFP 2011-03
- “Defendant’s Ex. U”: Email from DOCCS (Redacted) (Nov. 18, 2014)
- “Defendant’s Ex. V”: New York Bill A.6791-S.4697
- “Defendant’s Ex. W”: List of payments to Joining Hands Management
- “Defendant’s Ex. X”: Article, Housing as Health Care, New York’s Boundary-Crossing Experiment, J. Am. Med. Assoc. (Dec. 19, 2013)
- “Defendant’s Ex. Y”: Pest control invoices
- “Defendant’s Ex. Z”: OASAS Website “Housing” page (<http://www.oasas.ny.gov/housing/>)
- “Defendant’s Ex. AA”: Affidavit of Rashawnt Mack
- “Defendant’s Ex. AB”: OASAS Regulation 822-2.6

We note that we previously disclosed to the Government copies of Defendant’s Exhibits M through W, and the Government stated that it has no objection, with the exception that it reserves the right to object to certain aspects of Defendant’s Exhibits U and V.

Respectfully,

*/s/ Joseph A. Murphy*

Joseph A. Murphy

JAM  
Enclosures

Hon. John G. Koeltl  
December 1, 2014  
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cc: **Via Electronic Filing and Email**

Christine Phillips, Esq.  
Kirti Reddy, Esq.  
William Passannante, Esq.  
*United States Attorney's Office - Southern District of  
New York*

**Via Email**

Christopher M. Shaw, Esq.  
Carolyn T. Ellis, Esq.  
David Abrams, Esq.  
Alee Scott, Esq.  
*Office of the New York Attorney General*

**Via Email**

Aaron Bloom, Esq.  
*New York City Assistant Corporation Counsel*